

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA**

IN RE:]	
]	CHAPTER 11
MULLIS GARAGE & AUTO PARTS, LLC,]	CASE NO: 15-30116-SDB
DEBTOR.]	

**MOTION FOR EXPEDITED HEARING ON MOTION FOR AUTHORITY TO USE
CASH COLLATERAL AND GRANT REPLACEMENT LIEN**

COMES NOW the Debtor who shows this Court the following:

1.

The Debtor as Debtor-In-Possession has filed a Motion for Authority to Use Cash Collateral and Grant Replacement Lien to authorize it to incur secured indebtedness in the use of its cash collateral.

2.

The nature of the Motion requires expedited in hearing inasmuch as if the Debtor does not get permission to use cash collateral it will be unable to continue to operate its business.

3.

The use of cash collateral is in the ordinary course of the Debtor's business. However, since it involves pledging cash collateral as security, the motion requires notice and an opportunity for a hearing.

4.

The Court has authority to set hearings on an expedited basis upon separate Motion and Certificate of Necessity.

WHEREFORE, the Debtor respectfully prays that this Court:

a.) expedite the hearing on the Debtor's Motion for Authority to Use Cash Collateral and

Grant Replacement Lien within five days from the date of approval of this Motion or such other time as the Court deems appropriate under the circumstances; and

b.) grant the Debtor any and all further relief as is just.

SO MOVED this 1st day of May 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

JON A. LEVIS
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848

LAW OFFICES:

MERRILL & STONE, LLC
SECOND FLOOR - MITCHELL BUILDING
101 S. MAIN STREET
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SWAINSBORO, GA 30401
(478)237-7029
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CERTIFICATE OF NEED

THE UNDERSIGNED certifies that the Debtor's estate could suffer immediate and irreparable harm unless an expedited hearing is held to consider the Debtor's Motion for Authority to Use Cash Collateral and Grant Replacement Lien inasmuch as inasmuch as if the Debtor does not get permission to use cash collateral it will be unable to continue to operate its business.

THIS 1st day of May, 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

JON A. LEVIS
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848

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EMANUEL COUNTY, GEORGIA

CERTIFICATE OF SERVICE

I, Jon A. Levis, of the firm of Merrill & Stone, Attorneys at Law, Post Office Box 129, Swainsboro, Georgia 30401, do hereby certify that I have served a copy of the within foregoing

MOTION FOR EXPEDITED HEARING ON MOTION FOR AUTHORITY TO USE CASH

COLLATERAL AND GRANT REPLACEMENT LIEN, CERTIFICATE OF NEED, ORDER

ON MOTION FOR EXPEDITED HEARING ON APPLICATION FOR HEARING to:

Matthew E. Mills, Esq.
Office of the U.S. Trustee
Johnson Square Business Center
2 East Bryan Street, Suite 725
Savannah, GA 31401

Joshua E. Kight, Esq.
Attorney At Law
Post Office Box 816
Dublin, GA 31040

Edward B. Claxton, III, Esq.
Edward B. Claxton, III, LLC
Post Office Box 16459
Dublin, GA 31040

Mr. Lucas Cowart
Morris State Bank
Post Office Box 520
Dublin, GA 31040

by email and/or mailing a copy through the United States mail with sufficient postage attached thereto to assure delivery.

THIS the 1st day of May, 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

JON A. LEVIS, ESQ.
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848

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